

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S
MOTION TO COMPEL PLAINTIFF'S DISCOVERY RESPONSES AND PAY COSTS**

EXHIBIT 13

*December 2, 2016 Email from Greg Gorski regarding Mr. Shelton's objection to
place of deposition*



Re: Shelton - Plaintiff's Father's Deposition Location 
John Paul Putney/JonesDay to: Gregory Gorski
4-9593

12/09/2016 04:18 PM

Greg--

Mr. Shelton was first subpoenaed almost four weeks ago for a deposition that was to have taken place almost three weeks ago. We agreed to the date, December 15th, because you proposed it on behalf of your client--the deponent--and at a location not far from his primary residence. I understand that being deposed inevitably entails some disruption to Mr. Shelton's busy schedule, but coming downtown seems fairly reasonable given that Mr. Shelton is not the only person affected and that most of the people participating in the deposition will be traveling much farther than Mr. Shelton.

Thanks,

John Paul Putney
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Gregory Gorski

Hi John, Since it appears the deposition of Plaintiff's father is going to end up going forward, Mr. Shelton has a busy work schedule and would like the deposition to be conducted in King of Prussia, which I think is reasonable. Can you advise regarding the location you would like to conduct the deposition in or near King of Prussia.

12/08/2016 04:18:03 PM

From: Gregory Gorski <ggorski@consumerlawfirm.com>
To: John Paul Putney <jputney@jonesday.com>
Date: 12/08/2016 04:18 PM
Subject: Shelton - Plaintiff's Father's Deposition Location

Hi John,

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GG

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